

November 30, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: **VoIP E911 Compliance Report (November 28, 2005)**
Metropolitan Telecommunications Corporation; WC Docket No. 05-196

Dear Ms. Dortch:

Metropolitan Telecommunications Corporation ("MetTel"), through its undersigned counsel and pursuant to Commission Rule 9.5(f), as adopted by the Commission's *VoIP E911 Order*¹ concerning the enhanced 911 ("E911") service requirements and conditions applicable to interconnected Voice over Internet Protocol ("VoIP") service providers, submits this Compliance Report ("Report") to advise the Commission of the status of MetTel's efforts to comply with the Commission's VoIP E911 rules.²

MetTel provides integrated communications services to businesses. MetTel does not serve the residential market. MetTel offers communications solutions such as: "MetVoice," a low cost, high quality voice service for one or many business locations; "MetConnect," a service aimed at moving data seamlessly, transparently and quickly using DSL or T1/T3 services; "MetPath," an advanced voice and data communications service offering private lines, frame relay, ISDN, integrated T1, and other services; and "MetVoIP," a VoIP product offering three solutions - Integrated T1, Hosted Centrex Service and Hosted PBX Service, all customized to address the specific convergence needs of MetTel customers.

¹ *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking 20 FCC Rcd. 10245 (2005) ("*VoIP E911 Order*").

² MetTel was unable to submit its compliance report by November 28, 2005, due to unavoidable travel outside the country by principals of the Company at the filing time. As such, MetTel respectfully requests a waiver of the Commission's Rules to the extent necessary for the Commission to accept this late filing. MetTel, however, confirms that the Company was in full compliance with the requirements of the *VoIP E911 Order* as of November 28, 2005, as detailed herein.

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As required by the Commission's rules, as well as the Public Notice issued by the Enforcement Bureau on November 7, 2005³ (the "Public Notice"), this Report details MetTel's efforts to provide E911 service to customers in compliance with Commission Rule 9.5(b) and (c), and comply with registered location requirements of Commission Rule 9.5(d).

Further, MetTel notes that the Company met the requirements of Commission Rule 9.5(e), as the Company notified all customers and obtained 100% affirmative acknowledgments from those customers prior to the Commission's original July 29, 2005 deadline. The Company also complies with the ongoing obligations of Commission Rule 9.5(e) insofar as MetTel provides the requisite notifications and obtains affirmative acknowledgments from all new subscribers.

Pursuant to the information requested by the Enforcement Bureau in the Public Notice, the Company provides as follows:

- 1) **A quantification, on a percentage basis, of the number of subscribers to whom the Company is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*.**

As of November 21, 2005, the Company is able to provide compliant VoIP 911 service to 100% of the Company's VoIP subscribers.

- 2) **A detailed statement as to whether the Company is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."**

MetTel only offers fixed VoIP services; all subscribers have fixed locations. MetTel is interconnected with a competitive local exchange carrier, which provides direct pass through trunking to all Selective Routers within the appropriate LATAs along with the appropriate trunk groups to get to the appropriate PSAP through the Selective Routers. As such, the Company is transmitting all 911 calls via the Wireline E911 Network, in accordance with the Commission's rules.

- 3) **If the Company is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, a detailed explanation of why not.**

³ *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, Public Notice, DA 05-2945 (rel. Nov. 7, 2005).

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Not applicable. Please refer to MetTel's answer to Question 2 above.

- 4) **The number of Selective Routers to which the Company has interconnected, directly or indirectly, as of November 28, 2005.**

As of November 28, 2005, the Company has indirectly interconnected to eight (8) Selective Routers.

- 5) **A detailed statement as to whether the Company is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information.**

As noted above in response to Question 2, MetTel is transmitting via the Wireline E911 Network. The Company is providing ANI and Registered Location information to all answering points capable of receiving and processing this information, which is updated in the appropriate ALI database.

- 6) **The percentage of how many answering points within the Company's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits.**

To MetTel's knowledge and belief, 100% of answering points in the Company's service area, LATAs 132 and 224, are capable of receiving and processing ANI and Registered Location information transmitted by the Company.

- 7) **The percentage of subscribers whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information**

To the Company's knowledge and belief, ANI and Registered Location information is capable of being transmitted to the answering points of 100% of the Company's VoIP customers. As noted above in response to Question 5, MetTel is providing such information to those PSAPs.

- 8) **If the Company is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.**

Not applicable. Please refer to MetTel's response to Question 5 above.

- 9) **To the extent the Company has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the Company should describe in detail, either in narrative form or by map, the areas of the country, on an MSA basis, where it is in full compliance and those in which it is not.**

Not applicable. Please refer to MetTel's responses to Questions 2 and 5 above.

- 10) **If not in full compliance, the Company's plans for coming into full compliance with the requirements of the *Order*, including its anticipated timeframe for such compliance.**

Not applicable. Please refer to MetTel's responses to Questions 2 and 5 above.

- 11) **A detailed description of all actions the Company has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location (including, but not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the Company has obtained the Registered Location).**

Since MetTel is delivering a dedicated T1 facility to the customer premises, the address is verified by the delivery of the service. This is the address that is used to update the appropriate ALI database.

- 12) **A detailed description of the method(s) the Company has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the Company is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.**

Not applicable. MetTel's service is fixed, not nomadic, and customers are unable to move locations without transferring service with MetTel.

- 13) **A detailed description of any technical solutions the Company is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.**

Not applicable. Please refer to MetTel's response to Question 12 above.

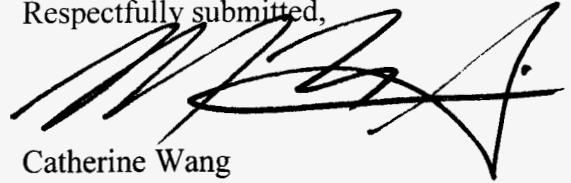
- 14) **A description of any automatic detection mechanism that enables the Company to identify when a customer may have moved his or her interconnected VoIP service to a new location and ensure that the customer continues to receive 911 service even when using the interconnected VoIP service nomadically.**

Not applicable. Please refer to MetTel's response to Question 12 above.

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Respectfully submitted,

A handwritten signature in black ink, appearing to be 'C. Wang', written over the text 'Respectfully submitted,'.

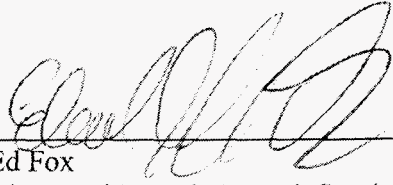
Catherine Wang

Jeffrey R. Strenkowski

Counsel for Metropolitan
Telecommunications Corporation

cc: Byron McCoy (FCC)
Kathy Berthot (FCC)
Janice Myles (FCC)
Best Copy and Printing, Inc.

I, Ed Fox state that I am Vice President of Network Services, of MetTel; that I am authorized to submit the forgoing *VoIP E911 Compliance Report* ("*Report*") on behalf of MetTel; that the *Report* was prepared under my direction and supervision; and I declare under penalty of perjury that the *Report* is true and correct to the best of my knowledge, information, and belief.


Name: Ed Fox
Title: Vice President of Network Services
MetTel